



Valley Telephone Cooperative Copper Valley Telephone Valley Connections, LLC
Valley Telecommunications – Internet – Business Systems

REDACTED- FOR PUBLIC INSPECTION

June 29, 2014

VIA OVERNIGHT DELIVERY

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, S.W.
Washington, DC 20554

RE: **Confidential Financial Information Subject to Protective Order in WC Docket Nos. 10-90, 07-135, 05-337, 03-109, CC Docket Nos. 01-92, 96-45, GN Docket No. 09-51, WT Docket No. 10-208, Before the Federal Communications Commission**

Dear Ms. Dortch:

Valley Telephone Cooperative, Inc. , a privately-held rate of return carrier receiving high cost support, has electronically submitted FCC Form 481 to the Commission with redacted financial data, in compliance with 47 C.F.R. §§ 54.313 and 54.422

As specified in the Protective Order issued on November 16, 2012 by the Commission, two copies of the redacted confidential information are being filed simultaneously with the non-redacted confidential information. The redacted information for this filing and each page of the file where confidential information has been omitted is marked "REDACTED - FOR PUBLIC INSPECTION"

Please feel free to contact me with any questions regarding this particular matter.

Sincerely,

Virgil Barnard
Contracts & Compliance Manager

Enclosures

.cc Mr. Charles Tyler, FCC Telecommunications Access Policy Division

**FCC Form 481 - Carrier Annual Reporting
Data Collection Form**

 FCC Form 481
 OMB Control No: 3060-0986/OMB Control No: 3060-0819
 July 2013

<010> Study Area Code	452176
<015> Study Area Name	VALLEY TELEPHONE COOPERATIVE, INC.
<020> Program Year	2015
<030> Contact Name: Person USAC should contact with questions about this data	Virgil Barnard
<035> Contact Telephone Number: Number of the person identified in data line <030>	5203848932 ext.
<039> Contact Email Address: Email of the person identified in data line <030>	virgil.barnard@vtc.net

ANNUAL REPORTING FOR ALL CARRIERS		54.313 Completion Required	54.422 Completion Required
(check box when complete)			
<100> Service Quality Improvement Reporting	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<200> Outage Reporting (voice)	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<210> <input type="checkbox"/> <- check box if no outages to report		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<300> Unfulfilled Service Requests (voice)	0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<310> Detail on Attempts (voice)	<div style="border: 1px solid black; height: 40px; width: 300px;"></div> (attach descriptive document)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<320> Unfulfilled Service Requests (broadband)	0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<330> Detail on Attempts (broadband)	<div style="border: 1px solid black; height: 40px; width: 300px;"></div> (attach descriptive document)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<400> Number of Complaints per 1,000 customers (voice)		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<410> Fixed	0.0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<420> Mobile	0.0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<430> Number of Complaints per 1,000 customers (broadband)		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<440> Fixed	0.0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<450> Mobile	0.0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<500> Service Quality Standards & Consumer Protection Rules Compliance	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<510> <div style="border: 1px solid black; padding: 2px;">452176-AZ-Srvc Qual Line 510.pdf</div>	(attached descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<600> Functionality in Emergency Situations	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<610> <div style="border: 1px solid black; padding: 2px;">452176-AZ-Emergency Line 610.pdf</div>	(attached descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<700> Company Price Offerings (voice)	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<710> Company Price Offerings (broadband)	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<800> Operating Companies and Affiliates	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<900> Tribal Land Offerings (Y/N)? <input type="radio"/> <input checked="" type="radio"/>	(if yes, complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1000> Voice Services Rate Comparability	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1010> <div style="border: 1px solid black; padding: 2px;">452176-AZ-Voice Rate Comparability Line 1010.pdf</div>	(attach descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1100> Terrestrial Backhaul (Y/N)? <input checked="" type="radio"/> <input type="radio"/>	(if not, check to indicate certification)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<1110>	(complete attached worksheet)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<1200> Terms and Condition for Lifeline Customers	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Price Cap Carriers, Proceed to Price Cap Additional Documentation Worksheet			
Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers			
<2000>	(check to indicate certification)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<2005>	(complete attached worksheet)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Rate of Return Carriers, Proceed to ROR Additional Documentation Worksheet			
<3000>	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<3005>	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

**(100) Service Quality Improvement Reporting
Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	452176
<015>	Study Area Name	VALLEY TELEPHONE COOPERATIVE, INC.
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Virgil Barnard
<035>	Contact Telephone Number - Number of person identified in data line <030>	5203846932 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	virgil.barnard@vte.net
<110>	Has your company received its ETC certification from the FCC?	(yes / no) <input type="radio"/> <input checked="" type="radio"/>
<111>	If your answer to Line <110> is yes, do you have an existing § 54.202(a) "5 year plan" filed with the FCC?	(yes / no) <input type="radio"/> <input type="radio"/>

If your answer to Line <111> is yes, then you are required to file a progress report, on line <112> delineating the status of your company's existing § 54.202(a) "5 year plan" on file with the FCC, as it relates to your provision of voice telephony service.

- <112> Attach Five-Year Service Quality Improvement Plan or, in subsequent years, your annual progress report filed pursuant to 47 C.F.R. § 54.313(a)(1). If your company is a CETC which only receives frozen support, your progress report is only required to address voice telephony service.

452176-A2-Svc Qual Improv Line 118.pdf

Name of Attached Document

Please check these boxes below to confirm that the attached document(s), on line 112, contains a progress report on its five-year service quality improvement plan pursuant to § 54.202(a). The information shall be submitted at the wire center level or census block as appropriate.

- <113> Maps detailing progress towards meeting plan targets
- <114> Report how much universal service (USF) support was received
- <115> How (USF) was used to improve service quality
- <116> How (USF) was used to improve service coverage
- <117> How (USF) was used to improve service capacity
- <118> Provide an explanation of network improvement targets not met in the prior calendar year.

<010> Study Area Code 452176

<015>	Study Area Name	VALLEY TELEPHONE COOPERATIVE, INC.
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<020> Program Year	2015
--------------------	------

<030> Contact Name - Person USAC should contact regarding this data Virgil Barnard

<035> Contact Telephone Number - Number of person identified in data line <030> \$203848932 ext.

<039>	Contact Email Address - Email Address of person identified in data line <030>	virgil.barnard@vtc.net
-------	---	------------------------

<220> <a> <b1> <b2> <b3> <b4> <c1> <c2> <d> <e> <f> <g> <h>

[illegible]

<039>	Contact Email Address - Email Address of person identified in data line <030>	virgil.barnard@vtc.net
-------	---	------------------------

<702> Single State-wide Residential Local Service Charge

[illegible]

(710) Broadband Price Offerings Data Collection Form FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0815 July 2013

<010>	Study Area Code	452176
<015>	Study Area Name	VALLIS TELEPHONE COOPERATIVE, INC.
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Virgil Barnard
<035>	Contact Telephone Number - Number of person identified in data line <030>	5203846932 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	virgil.barnard@vtc.net

[illegible]

<010>	Study Area Code	452176
<015>	Study Area Name	VALLEY TELEPHONE COOPERATIVE, INC.
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Virgil Barnett
<035>	Contact Telephone Number - Number of person identified in data line <030>	5203846932 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	virgil.barnard@vcc.net
<810>	Reporting Carder	Valley Telephone Cooperative, Inc.
<811>	Holding Company	
<812>	Operating Company	

<a1>	<a2>	<a3>
Affiliates	SAC	Doing Business As Company or Brand Designation

(900) Tribal Lands Reporting
Data Collection Form

FCC Form 481

OMB Control No. 3060-0986 / OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	452176
<015>	Study Area Name	VALLEY TELEPHONE COOPERATIVE, INC.
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Virgil Barnard
<035>	Contact Telephone Number - Number of person identified in data line <030>	5203846932 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	virgil.barnard@vtc.net

<910> Tribal Land(s) on which ETC Serves

--

<920> Tribal Government Engagement Obligation

--

Name of Attached Document

If your company serves Tribal lands, please select (Yes, No, NA) for each these boxes to confirm the status described on the attached document(s), on line 920, demonstrates coordination with the Tribal government pursuant to § 54.313(a)(9) includes:

- | | |
|-------|--|
| <921> | Needs assessment and deployment planning with a focus on Tribal community anchor institutions. |
| <922> | Feasibility and sustainability planning; |
| <923> | Marketing services in a culturally sensitive manner; |
| <924> | Compliance with Rights of way processes |
| <925> | Compliance with Land Use permitting requirements |
| <926> | Compliance with Facilities Siting rules |
| <927> | Compliance with Environmental Review processes |
| <928> | Compliance with Cultural Preservation review processes |
| <929> | Compliance with Tribal Business and Licensing requirements. |

Select (Yes, No, NA)

(1100) No Terrestrial Backhaul Reporting
Data Collection Form

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	452176
<015>	Study Area Name	VALLEY TELEPHONE COOPERATIVE, INC.
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Virgil Barnard
<035>	Contact Telephone Number - Number of person identified in data line <030>	5203846932 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	virgil.barnard@vtc.net

Please check this box to confirm no terrestrial backhaul
<1120> options exist within the supported area pursuant to § 54.313(G) ☐

Please check this box to confirm the reporting carrier offers
<1130> broadband service of at least 1 Mbps downstream and 256 kbps
upstream within the supported area pursuant to § 54.313(G) ☐

(1200) Terms and Condition for Lifeline Customers
Lifeline
Data Collection Form

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	452176
<015>	Study Area Name	VALLEY TELEPHONE COOPERATIVE, INC.
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Virgil Barnard
<035>	Contact Telephone Number - Number of person identified in data line <030>	5203840932 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	virgil.barnard@vrc.net

452176-AZ-Lifeline Texas Line 1210.pdf

<1210> Terms & Conditions of Voice Telephony Lifeline Plans

Name of Attached Document

<1220> Link to Public Website

HTTP

"Please check these boxes below to confirm that the attached document(s), on line 1210, or the website listed, on line 1220, contains the required information pursuant to § 54.422(a)(2) annual reporting for ETCs receiving low-income support, carriers must annually report:

- <1221> Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers, ☒
- <1222> Details on the number of minutes provided as part of the plan, ☒
- <1223> Additional charges for toll calls, and rates for each such plan. ☒

(2000) Price Cap Carrier Additional Documentation		FCC Form 481
Data Collection Form		OMB Control No. 3060-0986/OMB Control No. 3060-0819
Including Rate-of-Retain Carriers affiliated with Price Cap Local Exchange Carriers		July 2013

<010>	Study Area Code	452176
<015>	Study Area Name	VALLEY TELEPHONE COOPERATIVE, INC.
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Virgil Barnard
<035>	Contact Telephone Number - Number of person identified in data line <030>	5203848912 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	virgil.barnard@vte.net

CHECK the boxes below to note compliance as a recipient of Incremental Connect America Phase I support, frozen High Cost support, High Cost support to offset access charge reductions, and Connect America Phase II support as set forth in 47 CFR § 54.313(b),(c),(d),(e) the information reported on this form and in the documents attached below is accurate.

Incremental Connect America Phase I reporting		
<2010>	2nd Year Certification (47 CFR § 54.313(b)(1))	<input type="checkbox"/>
<2011>	3rd Year Certification (47 CFR § 54.313(b)(2))	<input type="checkbox"/>
Price Cap Carrier Receiving Frozen Support Certification (47 CFR § 54.312(a))		
<2012>	2013 Frozen Support Certification	<input type="checkbox"/>
<2013>	2014 Frozen Support Certification	<input type="checkbox"/>
<2014>	2015 Frozen Support Certification	<input type="checkbox"/>
<2015>	2016 and future Frozen Support Certification	<input type="checkbox"/>
Price Cap Carrier Connect America ICC Support (47 CFR § 54.313(d))		
<2016>	Certification Support Used to Build Broadband	<input type="checkbox"/>
Connect America Phase II Reporting (47 CFR § 54.313(e))		
<2017>	3rd year Broadband Service Certification	<input type="checkbox"/>
<2018>	5th year Broadband Service Certification	<input type="checkbox"/>
<2019>	Interim Progress Certification	<input type="checkbox"/>
<2020>	Please check the box to confirm that the attached document(s), on line 2021, contains the required information pursuant to § 54.313 (e)(3)(ii), as a recipient of CAF Phase II support shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.	<input type="checkbox"/>

<2021> Interim Progress Community Anchor Institutions

Name of Attached Document Listing Required Information

(3000) Rate Of Return Carrier Additional Documentation Data Collection Form	FCC Form 481 OMB Control No. 3060-0866/OMB Control No. 3060-0819 July 2013
--	--

<010> Study Area Code 452176
 <015> Study Area Name VALLEY TELEPHONE COOPERATIVE, INC.
 <020> Program Year 2015
 <030> Contact Name - Person USAC should contact regarding this data Vitell Barnard
 <035> Contact Telephone Number - Number of person identified in data line <030> 5203848332 ext.
 <039> Contact Email Address - Email Address of person identified in data line <030> vitell.barnard@vtc.net

CHECK the boxes below to note compliance on its five year service quality plan (pursuant to 47 CFR § 54.302(a)) and, for privately held carriers, ensuring compliance with the financial reporting requirements set forth in 47 CFR § 54.313(f)(2). I further certify that the information reported on this form and in the documents attached below is accurate.

(3010) Progress Report on 5 Year Plan
 Milestone Certification (47 CFR § 54.313(f)(1)(i))

Name of Attached Document Listing Required Information

(3011) Please check this box to confirm that the attached document(s), on line 3012 contains the required information pursuant to § 54.313(f)(1)(i), the carrier shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.

(3012) Community Anchor Institutions (47 CFR § 54.313(f)(1)(ii))

Name of Attached Document Listing Required Information

(3013) Is your company a Privately Held RUS Carrier (47 CFR § 54.313(f)(2))
 (3014) If yes, does your company file the RUS annual report

(Yes/No) 88
 (Yes/No)

Please check these boxes to confirm that the attached document(s), on line 3017, contains the required information pursuant to § 54.313(f)(2) compliance requires:

(3015) Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers)

☒

(3016) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows

☒

(3017) If the response is yes on line 3014, attach your company's RUS annual report and all required documentation

Name of Attached Document Listing Required Information

(3018) If the response is no on line 3014, is your company audited?

(Yes/No) 00

If the response is yes on line 3018, please check the boxes below to confirm your submission, on line 3025 pursuant to § 54.313(f)(2), contains:

(3019) Either a copy of their audited financial statement; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications

☐

(3020) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows

☐

(3021) Management letter issued by the independent certified public accountant that performed the company's financial audit.

☐

If the response is no on line 3018, please check the boxes below to confirm your submission, on line 3025 pursuant to § 54.313(f)(2), contains:

(3022) Copy of their financial statement which has been subject to review by an independent certified public accountant; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers,

☐

(3023) Underlying information subjected to a review by an independent certified public accountant

☐

(3024) Underlying information subjected to an officer certification,

☐

(3025) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows

(3026) Attach the worksheet listing required information

Name of Attached Document Listing Required Information

Certification - Reporting Carrier Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
---	--

<010> Study Area Code	452176
<015> Study Area Name	VALLEY TELEPHONE COOPERATIVE, INC.
<020> Program Year	2015
<030> Contact Name - Person USAC should contact regarding this data	Virgil Barnard
<035> Contact Telephone Number - Number of person identified in data line <030>	5203848932 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	virgil.barnard@vtc.net

TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:

Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients	
I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate.	
Name of Reporting Carrier: VALLEY TELEPHONE COOPERATIVE, INC.	
Signature of Authorized Officer: CERTIFIED ONLINE	Date 06/27/2014
Printed name of Authorized Officer: Steven Metts	
Title or position of Authorized Officer: CEO	
Telephone number of Authorized Officer: 5203842231 ext.	
Study Area Code of Reporting Carrier: 452176	Filing Due Date for this form: 07/01/2014
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

Certification - Agent / Carrier Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
---	--

<010> Study Area Code	452176
<015> Study Area Name	VALLEY TELEPHONE COOPERATIVE, INC.
<020> Program Year	2015
<030> Contact Name - Person USAC should contact regarding this data	Virgil Barnard
<035> Contact Telephone Number - Number of person identified in data line <030>	5203648932 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	virgil.barnard@vtco.net

TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:

Certification of Officer to Authorize an Agent to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I certify that (Name of Agent) _____ is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate.	
Name of Authorized Agent: _____	
Name of Reporting Carrier: _____	
Signature of Authorized Officer: _____	Date: _____
Printed name of Authorized Officer: _____	
Title or position of Authorized Officer: _____	
Telephone number of Authorized Officer: _____	
Study Area Code of Reporting Carrier: _____	Filing Due Date for this form: _____
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

TO BE COMPLETED BY THE AUTHORIZED AGENT:

Certification of Agent Authorized to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I, as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service support recipients on behalf of the reporting carrier; I have provided the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the information reported herein is accurate.	
Name of Reporting Carrier: _____	
Name of Authorized Agent or Employee of Agent: _____	
Signature of Authorized Agent or Employee of Agent: _____	Date: _____
Printed name of Authorized Agent or Employee of Agent: _____	
Title or position of Authorized Agent or Employee of Agent: _____	
Telephone number of Authorized Agent or Employee of Agent: _____	
Study Area Code of Reporting Carrier: _____	Filing Due Date for this form: _____
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

Attachments

Response Line 100
Valley Telephone Cooperative, Inc.
Study Area 452176

REDACTED FOR PUBLIC INSPECTION

REDACTED FOR PUBLIC INSPECTION

Response Line 200
Valley Telephone Cooperative, Inc.
Study Area 452176

REDACTED FOR PUBLIC INSPECTION

REDACTED FOR PUBLIC INSPECTION

Line 510

Description of Efforts in Compliance With
Service Quality Standards and Consumer Protection for Voice and Broadband Networks

Valley Telephone Cooperative, Inc. and Copper Valley Telephone, Inc.

SAC 452176 & 492176

Valley Telephone Cooperative, Inc. and Copper Valley Telephone, Inc. (the Companies) are wireline rural local exchange carriers serving as ETCs in southeast Arizona and southwest New Mexico. The companies comply with all state and federal service quality and consumer protection standards.

The Companies continually strive to maintain the highest customer satisfaction by consistently going beyond the minimum standards of service quality and consumer protection. The Companies regularly train all customer contact personnel in CPNI and Red Flag rules in order to maintain strict compliance. This training is designed to enforce compliance with relevant state standards for consumer protection and quality of service.

Line 610

Certification of Functionality in Emergency Situations

Valley Telephone Cooperative, Inc. and Copper Valley Telephone, Inc.

SAC 452176 & 492176

Valley Telephone Cooperative, Inc. and Copper Valley Telephone, Inc. (the Companies) are wireline rural local exchange carriers serving as ETCs in southeast Arizona and southwest New Mexico.

In order to assure reasonable back-up power to protect functionality in the event of failure of the external power grid the Companies have equipped all central offices with a minimum of eight hours of battery backup plus stationary generators with on-site fuel supplies that are capable of a minimum of one week run time. All remote carrier facilities are equipped battery backup that is designed to last at least eight hours. The Companies maintain an additional generator on wheels that can be deployed in the event of a need. All batteries are routinely maintained and replaced as needed. All generators are regularly tested and serviced to assure readiness.

The network employed by the Companies has electronic redundancy in all layer 3 network segments and most layer 2 network segments. The Companies have the ability to route traffic remotely in outage or emergency situations in layer 3 and most layer 2 networks.

The Companies have the capability to prioritize traffic in emergency situations.

(700) Price Offerings
Data Collection Form

OMB Control No. 3060-0986/OMB Control No. 3060-0819

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<010>	Study Area Code	452176
<015>	Study Area Name	VALLEY TELEPHONE COOPERATIVE, INC.
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Virgil Barnard
<035>	Contact Telephone Number - Number of person identified in data line <030>	5203848932 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	virgil.barnard@vtc.net

<701>	Residential Local Service Charge Effective Date	1/1/2014
<702>	Single State-wide Residential Local Service Charge	

<703>

[illegible]

(710) Broadband Price Offerings Data Collection Form

FCC Form 481
OMB Control No. 3060-0985/OMB Control No. 3060-0819
July 2013

<030>	Study Area Code	452176
<015>	Study Area Name	VALLEY TELEPHONE COOPERATIVE, INC.
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Virgil Barnard
<035>	Contact Telephone Number - Number of person identified in data line <030>	5203848922 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	virgil.barnard@vtc.net

[illegible]

REDACTED - FOR PUBLIC INSPECTION

<010>	Study Area Code	452176
<015>	Study Area Name	VALLEY TELEPHONE COOPERATIVE, INC.
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Virgil Barnard
<035>	Contact Telephone Number - Number of person identified in data line <030>	5203846932 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	virgil.barnard@vte.net
<810>	Reporting Carrier	Valley Telephone Cooperative, Inc.
<811>	Holding Company	
<812>	Operating Company	

[illegible]

Line 1010

Description of Voice Services Rate Comparability

Valley Telephone Cooperative, Inc. and Copper Valley Telephone, Inc.

SAC 452176 & 492176

Valley Telephone Cooperative, Inc. and Copper Valley Telephone, Inc. (the Companies) are wireline rural local exchange carriers serving as ETCs in southeast Arizona and southwest New Mexico.

The Companies monitor each publication of the national average urban rate for voice service to assure that these rates are not more than two standard deviations above the newly published national average.

The Companies residential voice service rates are \$14.00 in Arizona and \$15.28 in New Mexico. These rates are not more than two standard deviations above the national average urban rate for voice service as published by the Wireline Competition Bureau.

Line 1210

Description of Lifeline Terms and Conditions

Valley Telephone Cooperative, Inc. and Copper Valley Telephone, Inc.

SAC 452176 & 492176

Valley Telephone Cooperative, Inc. and Copper Valley Telephone, Inc. (the Companies) are wireline rural local exchange carriers serving as ETCs in southeast Arizona and southwest New Mexico. The lifeline service offered has unlimited local calling and equal access to the long distance provider of the customer's choice.

The Companies are equal access ILECs and therefore provide all customers the option to utilize the toll provider of their choice.

The residential rate for local service is \$14.00 in Arizona and \$15.28 in New Mexico before consideration of the applicable state and federal lifeline discounts.

Response Line 1316
Valley Telephone Cooperative, Inc.
Study Area 452176

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